

Appl. No. 10/628,928
Reply to Office Action of September 9, 2004

REMARKS/ARGUMENTS

Claim 1 is amended as suggested by the Examiner to avoid the formal objection. More specifically, "n1" and "X1" were substituted for "n" and "X" in the second formula. The amended claim 1 is supported by the original claim.

Claims 1-2, and 4-15 are rejected under 35 U.S.C. 102(b) as being anticipated by Konica Corp. (JP 10-0 10754) as evidenced by the Machine translation from Patent Abstracts of Japan publication number: 10-010754.

The Examiner states in the outstanding Office Action, "Konica Corp in their examples starting at [0088] make use of ethylenediaminetetraacetic acid as their "penetrant", i.e. the instant pre wash component. This ethylenediaminetetraacetic acid is an ethylenebis[iminodiacetic acid] as well. Thus, reading the instant N-alkyliminodiacetic acid or its salt as broadly as reasonably allowed from the instant application, the processes of Konica Corp anticipate the instant processes." (see Item 6 of page 3 of the Office Action).

There is also a formal objection as to the meaning of alkyl in the N-alkyliminodiacetic acid group. To avoid the issue and

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the Examiner's overly broad interpretation which, it is submitted, is not supported by the record, claim 1 is further amended to more specifically define the term in question. Support for the change is in the portion of the specification quoted by the Examiner (see page 17, lines 1-25).

It is submitted that the Examiner used overly broad interpretation of the claim term; however, the claim as now amended restricts the alkyl of the N-alkyliminodiacetic acid or its salt to a methyl group, an ethyl group, a propyl group, an isopropyl group, a hydroxyl group-substituted methyl group, a hydroxyl group-substituted ethyl group, a hydroxyl group-substituted propyl group, or a hydroxyl group-substituted isopropyl group. The thus limited N-alkyliminodiacetic acid is different from and not obvious in view of the ethylenediaminetetraacetic acid or ethylenebis[iminodiacetic acid] disclosed in the Konica Corp (JP 10-0 10754). Withdrawal of the anticipation rejection is therefore respectfully requested.

In addition, to avoid issues of obviousness, applicants direct attention to the evidence in the specification of unexpectedly good results obtained by the present invention.

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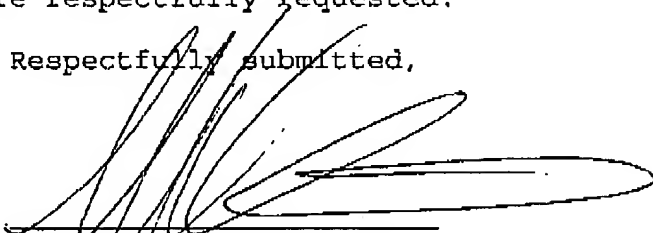
These results are summarized in Table 1 on page 81 of the specification. Referring to the results of the testing, in the examples of the present specification, pre-washing solution 7 containing ethylenediaminetetraacetic acid disodium salt (see page 77, lines 3 and 4 from the bottom of the specification), corresponding to ethylenediaminetetraacetic acid disclosed in the Konica Corp (JP 10-0 10754), is prepared and tested. As can be seen from Table 1 (page 81) of the specification, inventive methods employing the pre-washing solution as claimed provide excellent results in reduction of peppering and sludge as compared to the method employing the pre-washing solution 7 containing ethylenediaminetetraacetic acid disodium salt.

In view of the above, claims 1-2 and 4-15 are not anticipated by, nor obvious over, Konica Corp. (JP 10-0 10754).

In view of the above, the rejections are avoided. Allowance of the application is therefore respectfully requested.

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Respectfully submitted,



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